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December 22, 2023

Via ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Goidel et al. v. Aetna Life Insurance Co., No. 21-cv-7619

Your Honor:

Pursuant to the Court's order (Dkt. 78), we write on behalf of all parties with the status of settlement discussions. The parties are pleased to report that we had a successful mediation with former Magistrate Judge Steven M. Gold on December 11, 2023, and that the parties have come to an agreement on all remaining issues, including the injunctive and monetary issues that had been outstanding. Plaintiffs have sent a first draft of the settlement agreement to Aetna, but the parties require additional time to agree on a final draft of the agreement and to prepare the motion for preliminary approval. Accordingly, we jointly request an extension of the stay until January 31, 2024 to finalize the settlement agreement and motion for preliminary approval. To the extent that the parties are unable to agree on a final settlement agreement, the parties further agree that Plaintiffs shall not be prejudiced by this stay, including that Defendant shall not raise any arguments in opposition to class certification that would not have been available to them on June 30, 2023.

The parties respectfully ask the Court to so order this request.

Sincerely,

/s/

EMERY CELLI BRINCKERHOFF
ABADY WARD & MAAZEL LLP

/s/

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